

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
Jessica Lee Gonzalez,	:	Chapter 13
aka Jessica L. Gonzalez	:	
aka Jessica Gonzalez	:	Case No. 5:22-bk-02200-MJC
aka Jessica Singer	:	
aka Jessica Lee Singer	:	
aka Jessica L. Singer	:	
Debtor	:	
	:	
Jessica Lee Gonzalez	:	
Objector	:	OBJECTION TO
v.	:	PROOF OF CLAIM #1
United Auto Credit Corporation	:	
Claimant	:	

OBJECTION TO AMENDED CLAIM No. 1 OF
United Auto Credit Corporation

COMES NOW, the Debtor, by and through her attorneys, and in support of the Objection to Claim No. 1 of United Auto Credit Corporation, avers as follows:

1. Debtor filed the instant Chapter 13 bankruptcy on November 14, 2022.
2. On January 9, 2023, Claimant filed Amended Proof of Claim No. 1 in the amount of \$408,669.61 that is listed as secured. (POC 1-2).
3. The Claimant has not attached documentation showing evidence that the interest as to the Debtor is a perfected secured claim.
4. Claimant attached to the Claim a Complaint filed in the Superior Court of California, Orange County on or about October 3, 2022 (the "California Litigation").
5. There is no indication in the Claim or attachments that a judgment was ever entered against the Debtor in the California Litigation.
6. In fact, based on information and belief the California Litigation was withdrawn as to Debtor.
7. Regardless, since this appears to be a contingent or unliquidated claim this Court has

jurisdiction to estimate the value of this claim pursuant to 11 USC § 502(c) and a request for estimation of this claim is hereby made.

8. Alternatively, the claim should be reclassified as an unsecured claim in an amount to be determined after the lawsuit is concluded.

WHEREFORE, the Debtor prays that the Court conduct a hearing to determine whether the claim should be reclassified as an unsecured claim, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq.
Robert J. Kidwell, Esq.
Attorney I.D. #206555
Attorney for Debtor